

REMARKS

Claims 1-13 and 15-26 are pending in the application. Claims 1-13 and 15-26 currently stand rejected. Claim 1 and 15 are amended herein to correct the antecedent basis. The Applicant respectfully requests consideration of the following remarks and allowance of the claims.

35 U.S.C. § 102(b) Rejection

Claims 1-2, 6-9, 15-16, and 20-22 stand rejected under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 5,680,390 (Robrock). The Applicant respectfully traverses the rejection for at least the following reasons.

Claim 1 recites, in part, processing signaling for a voice call to generate a query to a *call center* having a plurality of devices within the *call center*, and transmitting the query to the *call center*.

Robrock is silent with respect to a call center. More specifically, Robrock is silent with respect to a call center having a plurality of devices. In the final Office Action, the Examiner equates a call center to a broadband intelligent network (BIN). (final Office Action, p. 3). The BIN contains a Service Control Point (SCP) which is used to provide a network control function for a fast-packet switch. Both the SCP and the fast-packet switch are standard components of an intelligent network and not equivalent to a call center as asserted by the Examiner.

Moreover, the Examiner equates the plurality of devices within the call center to operation systems 80. Operation systems 80 are not equivalent to a plurality of devices within the call center. The devices in a call center answer calls at the call center. (Immediate Application, p. 5, lines 4-5). As stated above, Robrock is silent regarding a call center and devices within a call center. Furthermore, the operation systems within Robrock are structured to provide predetermined operations functions. (Robrock, col. 3, lines 34-36). These operation functions are standard tools to maintain the SCP and not equivalent to a device answering calls at the call center. Thus, the operation systems 80 are not equivalent to devices within a call center.

Claim 1 also recites, in part, receiving a query response where the *response includes a packet address that identifies a device* from among the plurality of devices within the call center. Robrock does not disclose or suggest receiving a query response including a packet address that identifies a device from among the plurality of devices.

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Even assuming *arguendo* that Robrock does disclose a call center and a plurality of devices within the call center, Robrock still fails to disclose or suggest a query response where the response includes a packet address that identifies a device from among the plurality of devices within the call center. Rather, Robrock discloses a calling party (CPE) that already has the defined address for a called party or network device and generates a signaling cell to request a connection. (Robrock, col. 8, lines 25-29; Fig. 3, 91). The SCP query response does not contain a packet address that identifies a device (operation system) from among the plurality of devices. Rather, the response includes a command cell for the ATM switch which is used to populate a translation table for routing within the ATM switch, and a signaling cell for the called party. (Robrock, Fig. 3, 93 and 94). Thus, the response does not include a packet address that identifies a device from among the plurality of devices, as recited in claim 1.

For at least these reasons, Robrock cannot anticipate claim 1. Claim 1 is therefore patentable over the cited reference, and such indication is respectfully requested.

Independent claim 15 is rejected for similar reasons to claim 1. Claim 15 contains limitations similar to claim 1 and is therefore allowable over the art of record for the same reasons as claim 1.

While separately allowable over the art of record, the remaining dependent claims depend from otherwise allowable independent claims. The Applicant therefore refrains from a discussion of the dependent claims.

35 U.S.C. § 103(a) Rejections

Claims 3-5, 10-13, 17-19 and 23-26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Robrock. A discussion of this rejection is obviated in view of the discussion above distinguishing Robrock from independent claims 1 and 15.

CONCLUSION

Based on the above remarks, the Applicant submits that the claims in their present form are allowable. Additional reasons in support of patentability exist, but such reasons are omitted in the interests of clarity and brevity. The Applicant respectfully requests allowance of the claims.

The Applicant believes no additional fees are due with respect to this filing. However, should the Office determine additional fees are necessary, the Office is authorized to charge Deposit Account No. 21-0765 accordingly.

Respectfully submitted,

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